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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ERNEST BOCK, L.L.C.,

Plaintiff,

vs.

Case No.: 2:19-cv-01065-JAD-EJY

PAUL STEELMAN, individually; MARYANN
STEELMAN, individually; PAUL STEELMAN,
as trustee of the Steelman Asset Protection Trust;
MARYANN STEELMAN, as trustee of the
Steelman Asset Protection Trust; JIM MAIN, as
trustee of the Steelman Asset Protection Trust;
STEPHEN STEELMAN; SUZANNE
STEELMAN-TAYLOR; PAUL STEELMAN as
trustee of the Paul C. Steelman and Maryann T.
Steelman Revocable Living Trust; MARYANN
STEELMAN, as trustee of the Paul C. Steelman
and Maryann T. Steelman Revocable Living Trust;
PAUL STEELMAN, as the trustee of the Paul
Steelman Gaming Asset Protection Trust;
KEEPSAKE, INC.; SMMR, LLC; SMMR, LLC,
SERIES A-Z; SSSSS, LLC; SSSSS, LLC, SERIES
B; CHRISTIANA, LLC; CHRISTIANA, LLC,
SERIES A-Z; COMPETITION INTERACTIVE,
LLC; PAUL STEELMAN, LTD.; STEELMAN
PARTNERS, LLP; PAUL STEELMAN DESIGN
GROUP, INC.; SAPT HOLDINGS, LLC, SERIES
B; AARON SQUIRES; and MATTHEW
MAHANEY,

Defendants.

**JOINT STIPULATION AND PROPOSED
ORDER TO ADJOURN ORAL
ARGUMENT ON THE SECOND
MOTION TO DISMISS AARON SQUIRES
AND MATTHEW MAHANEY UNDER
FED. R. CIV. P. 12(b)(6)**

(First Request)



Plaintiff Ernest Bock, L.L.C. (“Bock”), the Steelman Parties¹, the Corporate Defendants², and the Professional Defendants³ by and through their respective undersigned counsel, hereby submit this Joint Stipulation in accordance with LR IA 6-1 and LR 26-3. This is the first stipulation to adjourn the oral argument on the Second Motion to Dismiss Aaron Squires and Matthew Mahaney under Fed. R. Civ. P. 12(b)(6)⁴ (hereinafter, “Second Motion to Dismiss”) from the scheduled date of January 3, 2024⁵ to a date convenient for the Court between January 29, 2024 and February 8, 2024. The Second Motion to Dismiss was filed on September 25, 2023⁶.

a. Reasons for the Adjournment

Counsel for several of the Parties have full schedules in the first few weeks of January 2024, creating logistical difficulties for an in-person oral argument in Nevada. Counsel for Bock has trial scheduled to begin on January 2, 2023 in New Jersey, which is expected to continue for at least a week. Counsel for Bock is then scheduled to travel out of state from January 10-14, 2024 to depose witnesses for other matters, and will be deposing Paul Steelman on January 22 and 23, 2024 for the New Jersey action⁷. Counsel for the Professional Defendants will be out of office

¹ The “Steeleman Parties” refer to Defendants Paul Steelman, individually; Maryann Steelman, individually; Paul Steelman, as trustee of the Steelman Asset Protection Trust (“SAPT”); Maryann Steelman, as trustee of the SAPT; Jim Main, as trustee of the SAPT; Stephen Steelman; Suzanne Steelman-Taylor; Paul Steelman, as trustee of the Paul C. Steelman and Maryann T. Steelman Revocable Living Trust (“RLT”); Maryann Steelman, as trustee of the RLT; and Paul Steelman, as trustee of the Paul Steelman Gaming Asset Protection Trust.

² The “Corporate Defendants” refer to Christiania, LLC; Christiania, LLC, Series A-Z; Competition Interactive, LLC; Keepsake, Inc.; Paul Steelman Design Group, Inc.; Paul Steelman, Ltd.; SAPT Holdings, LLC, Series B; SMMR, LLC; SMMR, LLC, Series A-Z; SSSSS, LLC; SSSSS, LLC, Series, B; and Steelman Partners, LLP. Bock named SMMR, LLC, Series A-Z and Christiania, LLC, Series A-Z as defendants and contends that they consist of fifty-two (52) separate defendants (i.e., SMMR, LLC, Series A; SMMR, LLC, Series B; etc.). Defendants disagree. In the interest of brevity, those defendants have been stylized as “Series A-Z.”

³ For purposes of this stipulation, the “Professional Defendants” will refer to Aaron Squires; and Matthew Mahaney.

⁴ ECF No. 245.

⁵ ECF No. 251.

⁶ ECF No. 245. This Second Motion to Dismiss is re-filed by the Professional Defendants. The first Motion to Dismiss Aaron Squires and Matthew Mahaney under Fed. R. Civ. P. 12(b)(6) (the “First Motion”) was filed on July 23, 2021. *See* ECF No. 171. The Court stayed the case and ruled on the First Motion on March 2, 2022. *See* ECF No. 235.

⁷ *Ernest Bock, L.L.C. v. Paul Steelman and Maryann Steelman, et al.*, No. ATL-L-2294-15



January 12-22, 2024, then is scheduled for a number of depositions and hearings in other matters throughout January 2024. Counsel for the Professional Defendants is unavailable on February 9, 2024. In light of the schedule conflict Bock's counsel has for the January 3 date, and the heavily saturated schedules faced by counsel for January 2024, the Parties request adjournment of the oral argument date so that all may be fully and fairly prepared to articulate their reasons for requested relief on the Second Motion to Dismiss.

b. Previous Extensions

There have been no previous extensions of the scheduled oral argument date on the Second Motion to Dismiss.

c. Stipulation

Bock, the Steelman Parties, the Corporate Defendants, and the Professional Defendants, hereby stipulate and agree that:

1. The oral argument on the Second Motion to Dismiss that is currently scheduled for January 3, 2024 at 11:00 a.m. in LV Courtroom 6D before Honorable Judge Jennifer A. Dorsey should be continued and reset to a date and time convenient for the Court between January 29, 2024 and February 8, 2024.

Dated: December 12, 2023.

DATED: December 12, 2023.

DATED: December 12, 2023.

**HANKIN, SANDMAN, PALLADINO,
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Attorneys for the Steelman Parties

1 DATED: December 12, 2023.

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6 *Attorney for Corporate Defendants*

DATED: December 12, 2023

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Attorney for Professional Defendants

ORDER

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10 The oral argument on the Second Motion to Dismiss currently scheduled for January
11 3, 2024 shall be adjourned and reset for January 29, 2024, at 3:00 p.m.

12 IT IS SO ORDERED on this 15th day of December, 2023.

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15 UNITED STATES DISTRICT JUDGE
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